

**Identification of Achievable Performance Standards**  
**Source Category: Wood Products Coating Operation**

Regulated Component	Pollutant	Rule/Measure/Date									
		Ventura County APCD Rule 74.30 9/10/96 *This rule controls ROC in lieu of VOC, but states in definitions ROC = VOC		CTG 9/27/96		NESHAP 12/7/95 *All limits except Strippers are VHAP limits. VHAP limits were not compared with VOC limits.					
		Performance Standard									
PCE/TCA/Meth Chloride exemptions			Rule 2: TCA, methylene chloride		40 CFR 51.100: PCE, TCA, methylene chloride		Does not exempt TCA, PCE, methylene chloride				
Adhesive and coating applications, general solvent limit											
Spray coating equipment, general											
Option I - Sealer, clear - Topcoat, clear - Primer/sealer/undercoat,pigmented - Topcoat, pigmented	VOC		See individual limits								
Option II - Sealer, clear - Topcoat, clear - Primer/sealer/undercoat,pigmented - Topcoat, pigmented	VOC		See individual limits								
Topcoat, clear	VOC		See Topcoat, clear: New and refinished		See Topcoat, waterborne and CTG		See Topcoat				

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		Performance Standard									
					options						
Topcoat, clear: new wood product	VOC	x	[275] sources currently meeting limit		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat, clear: refinished wood product	VOC	x	[680] sources currently meeting limit		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat, clear: shutters only	VOC		See Topcoat, clear: new and refinished		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat, clear: custom cabinetry and custom archetectural millwork	VOC		See Topcoat, clear: new		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat, clear: custom and contract furniture limits	VOC		See Topcoat, clear: new		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat, pigmented	VOC		See Coating, pigmented: new and refinished		See Topcoat, waterborne and CTG options		See Topcoat				
Topcoat,pigmented: Shutters	VOC		See Coating, pigmented: new and refinished		See Topcoat, waterborne and CTG options		See Topcoat				

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		Performance Standard						
Sealer, clear	VOC		See Sealer: new and refinished	See CTG options	See Sealer			
Sealer, new wood products	VOC	x	[240] source currently meeting limit		See Sealer			
Sealer: refinished wood products	VOC	x	[680] source currently meeting limit		See Sealer			
Sealer, clear: Shutters	VOC		See Sealer: new and refinished	See CTG options	See Sealer			
Sealer, sanding	VOC		See Sealer: new	See CTG options	See Sealer			
Sealer, sanding: custom cabinetry and custom architectural millwork	VOC		See Sealer: new	See CTG options	See Sealer			
Sealer, sanding; custom and contract furniture limits	VOC		See Sealer: new	See CTG options	See Sealer			
Sealer, pigmented	VOC		See Sealer: new and refinished	See CTG options	See Sealer			
Sealer, pigmented: Shutters	VOC		See Sealer: new and refinished	See CTG options	See Sealer			

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		Performance Standard									
Primer, pigmented	VOC		See coating, pigmented: new and refinished		See CTG options						
Primer, pigmented: Shutters	VOC		See Coating, pigmented: new and refinished		See CTG options						
Undercoat, pigmented	VOC		See Coating, pigmented: new and refinished		See CTG options						
Undercoat, pigmented: Shutters	VOC		See Coating, pigmented: new and refinished		See CTG options						
Barrier coat, plastic component	VOC		See Coating, pigmented: new and refinished		See CTG options						
Filler, composite wood edge	VOC		See Filler new and refinished								
Coating, extreme performance	VOC										

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		Performance Standard									
Filler	VOC		See Filler: new and refinished								
Filler, new wood product	VOC	x	[275] district unsure as to whether limit is currently being met								
Filler, refinished wood product	VOC	x	[500] district unsure as to whether limit is currently being met								
Filler, custom cabinetry and custom architectural millwork	VOC		See Filler: new								
Filler, custom and contract furniture limits	VOC		See Filler: new								
Stain, high- solid	VOC		See Stain, high-solid; new and refinished				See Stain				
Stain, high-solid: new wood products	VOC	x	[240] source currently meeting limit				See Stain				

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		Performance Standard									
Stain, high-solid: refinished wood products	VOC	x	[700] source currently meeting limit				See Stain				
Stain, high-solid: custom cabinetry and custom architectural millwork	VOC		See Stain, high-solid: new				See Stain				
Stain, high-solid: custom and contract furniture limits	VOC		See Stain, high-solid: new				See Stain				
Inks	VOC		See Ink: new and refinished								
Inks, new wood products	VOC	x	[500]								
Inks, refinished wood products	VOC	x	[500]								
Coating, mold-seal	VOC		See Coating, mold-seal: new and refinished								
Coating, mold-seal: new wood products	VOC	x	[750]								
Coating, mold-seal: refinished wood products	VOC	x	[750]								
Coating, multi-color	VOC		See Coating, multi-								

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		Performance Standard									
			color: new and refinished								
Coating, multi-color: new wood products	VOC	x	[275] district unsure as to whether limit is currently being met								
Coating, multi-color: refinished wood products	VOC	x	[680] district unsure as to whether limit is currently being met								
Barrier coat, low-solid plastic component	VOC		See Coating, pigmented: new and refinished								
Stain, low-solid	VOC		See Stain, low-solid: new and refinished				See Stain				
Stain, low-solid: new wood products	VOC	x	[120] district unsure as to whether limit is currently being met				See Stain				

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		Performance Standard									
Stain, low-solid: refinished wood products	VOC	x	[480] district unsure as to whether limit is currently being met				See Stain				
Stain, low-solid: custom cabinetry and custom architectural millwork	VOC		See Stain, low-solid: new				See Stain				
Stain, low-solid: custom and contract furniture limits	VOC		See Stain, low-solid: new				See Stain				
Toner, low-solid	VOC		See Toner, low-solid: new and refinished								
Toner, low-solid: new wood products	VOC	x	[120] district unsure as to whether limit is currently being met								
Toner, low-solid, refinished wood products	VOC	x	[480] district unsure as to whether limit is currently being met								



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		Performance Standard									
Washcoat, low-solid	VOC		See Washcoat, low-solid: new and refinished				See Washcoat				
Washcoat, low-solid: new wood products	VOC	x	[120] district unsure as to whether limit is currently being met				See Washcoat				
Washcoat, low-solid: refinished wood products	VOC	x	[480] district unsure as to whether limit is currently being met				See Washcoat				
Washcoat, low-solid: custom cabinetry and custom architectural millwork	VOC		See Washcoat, low-solid: new				See Washcoat				
Washcoat, low-solid: custom and contract furniture limits	VOC		See Washcoat, low-solid: new				See Washcoat				
Coating, pigmented	VOC		See Coating, pigmented: new and refinished								

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		Performance Standard									
Coating, pigmented: new wood products	VOC	x	[275] source currently meeting limit								
Coating, pigmented: refinished wood products	VOC	x	[600] source currently meeting limit								
Coating, pigmented: custom cabinetry and custom architectural millwork	VOC		See Coating, pigmented: new								
Coating, pigmented: custom and contract furniture limits	VOC		See Coating, pignmented: new								
Strippers	VOC	x	[350] or 2mm Hg 0.04 psia	x	(0.8)Spray booth		(0.8)Spray booth				

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		Performance Standard									
Adhesives	VOC						Foam Adhesives -{1.8}Existing -{0.2}New Source Others -{1.0} Existing -{0.2} New Source (existing sources <50 tons of HAP per year 12/98)				
Varnish, conversion	VOC										
Solvents, surface prep. And clean-up	VOC	x	[200] 45mm Hg								
Coating, medium density fiberboard: new wood products	VOC										
Coating, medium density fiberboard: refinished wood products	VOC										
Any other coating: new wood products	VOC										
Any other coating: refinished wood products	VOC										
Topcoat, waterborne	VOC			x	{0.8}						

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		Performance Standard									
CTG option - Topcoat - Sealer	VOC			x	-{1.8} -{1.9}						
CTG option - Acid-cured alkyd amino conversion varnish topcoat -acid-cured alkyd amino vinyl sealer	VOC			x	-{2.0} -{2.3}						
CTG option - Acid-cured alkyd amino conversion varnish topcoat -sealer	VOC			x	-{2.0} -{1.9}						
-CTG option - Sealer -Topcoat -Acid-cured alkyd amino vinyl sealer	VOC/ROC			x	-{1.8} -{2.3}						

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		Performance Standard									
Topcoat						-{1.0}Existing Source -{0.8}New Source (existing sources <50 tons of HAP per year 12/98)					
Washcoat						-{1.0}Existing Source -{0.8}New Source (existing sources <50 tons of HAP per year 12/98)					
Sealer						-{1.0}Existing Source -{0.8}New Source (existing sources <50 tons of HAP per year 12/98)					
Stain						-{1.0}Existing Source -{1.0}New Source (existing sources <50 tons of HAP per year 12/98)					

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		Performance Standard							
Basecoat						-{1.0} Existing -{0.8} New Source (existing sources <50 tons of HAP per year 12/98)			
Enamel						-{1.0} Existing -{0.8} New Source (existing sources <50 tons of HAP per year 12/98)			
Thinner		x	included in as-applied limit			-{10.0} Existing -{10.0} New Source -3.0% VHAP by weight if used to thin washcoat, basecoat or enamel onsite (existing sources <50 tons of HAP per year 12/98)			

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		Performance Standard							
Control equipment requirement	VOC		Combined capture and control efficiency of 80%	x	use a control system that will provide an equivalent emission reduction as VOC limits. (Equation)		Control device must operate at an efficiency that is equivalent to {1.0} existing or {0.8}new. For adhesives {1.0} existing or {0.2}adhesives Equation. (existing sources <50 tons of HAP per year 12/98)		

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		Performance Standard								
Transfer Efficiency			use one of the following methods: - electrostatic (60KV) - flow coat - dip coat - HVLP spray - paint brush - hand roller - roll coater -air assisted,airless spray(7/1/2000) - other 65% transfer eff		Conventional gun: air spray guns can be used only as follows: - touch-up and repair - finishing material less than 1.0lb VOC/lb solid -automated spray - cumulativ application less than 5.0% total gallons - only tech/economic feasible method		Conventional gun: air spray guns can be used only as follows: - touch-up and repair - finishing material less than 1.0lb VOC/lb solid -automated spray - cumulativ application less than 5.0% total gallons - only tech/economic feasible method			



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		Performance Standard							
Emission Averaging				-Averaging allowed using lower of actual vs. allowable values -Daily average. -Average must be less than or equal to 90% of coatings meeting standard	Averaging allowed for finishing materials only. Monthly average. For existing sources, the average VHAP content for all finishing materials must be no greater than 1.0 lb VHAP/lb solids. New source, the limit is 0.8. ALL coatings not just specific coatings with emission limits must be included in averaging equation.				
Alternative Emission Control Plan				Use any combination of an averaging approach, compliant finishing material, and control system.	Use any combination of an averaging approach, compliant finishing material, and control system.				

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		Performance Standard							
Work Practice Standards: Solvent Cleaning Operations		x	-ROC-containing materials for spray equipment cleaning cannot be used unless system used is, or equivalent to via test, an enclosed gun washer or “low emission spray gun cleaner” or pressure is 45mm Hg. -Storage of ROC-containing materials in closed non-leak absorbant containers.	x	-Spray Booth: use no more than 1 gallon of organic solvent per booth -Storage: normally closed containers (ncc)for finishing, gluing, cleaning and washoff. -Line cleaning: pump or drain solvent into ncc. -Gun cleaning: collect cosolvent and store in ncc. -Washoff: use ncc		-Spray Booth: use no more than 1 gallon of organic solvent per booth -Storage: normally closed containers (ncc)for finishing, gluing, cleaning and washoff. -Line cleaning: pump or drain solvent into ncc. -Gun cleaning: collect cosolvent and store in ncc. -Washoff: use ncc -Table 4 of NESHAP id’s pollutants excluded from use in washoff		
Work Practice Standard: Work Practice Implementation Plan				N Q	Develop a plan to implement WPS and maintain onsite		Develop a plan to implement WPS and maintain onsite		

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		Performance Standard								
Work Practice Standard: Operator Training Course				N Q	-Train all operators on proper application, clean-up, and equipment use - Write a training program and retain onsite					
Work Practice Standard: Leak Inspection and Maintenance Plan				N Q	-Develop written inspection and maintenance plan to address and prevent leaks. The plan should identify a minimum inspection frequency of once per month and procedures for addressing malfunctions					

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		Performance Standard							
Work Practice Standard: Formulation Assessment Plan						-Identify VHAPs of potential concern used in finishing operations. Establish a baseline level for each VHAP. If exceeded, the source shall develop a plan to reduce usage.			
Work Practice Standard: Cleaning and Washoff Solvent Accounting System				N Q	-Maintain a log of the quantity and type of solvent used for washoff and cleaning. -Maintain a log of the number of pieces washed-off and the reason for the washoff	-Maintain a log of the quantity and type of solvent used for washoff and cleaning. -Maintain a log of the number of pieces washed-off and the reason for the washoff			

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		Performance Standard							
Monitoring, Recordkeeping, and Reporting: Records		N	Retain records for 2 years	N	Compliant coatngs:	Compliant coatngs:			
	Q	- list of coatings in use and storage, include mix ratio, ROC content as applied  - list solvent and stripper in use and storage, include manufacturer, ROC content, partial pressure  -daily records on amount coating,stripper, solvent used; ROC content ea.; density ea. Momnthly records if only compliant coatings are kept  -Emission control system: daily record of key system operating parameters and maintenance procedures	Q	-Certified Public Data Sheets (CPDS) for each coating -Data sheets showing thinner usage and calculation of VOC content, as applied. - resevoir solvent and finishing material info for continous coaters calculation  Add-on control -CPDS -copies of calculations demonstrating equivalency of control system. -records of the daily average value of each continuously monitored parameter -pressure drop info as required.  Work practice standard records:	-Certified Public Data Sheets (CPDS) for each coating -Data sheets showing thinner usage and calculation of VHAP, in lb VHAP/lbs solid content, as applied. - resevoir solvent and finishing material inf for continous coaters  Add-on control -CPDS -copies of calculations demonstrating equivalency of control system. -records of the daily average value of each continuously monitored parameter -pressure drop info as required.				

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		Performance Standard						
				- Operator training program - Inspection and maintenance plan - Cleaning and washoff solvent accounting system - Spray booth cleaning - Application equipment requirements	Adhesives -CPDS - if thinned, thinner usage, VHAP content as applied -records documenting process contact adhesive was used -Add-on control: CPDS; copies of calculations for control system; daily average value of each continuously monitored parameter; system. pressure drop info. as required  Work practice standard records:  - Operator training program - Inspection and maintenance plan - Cleaning and washoff solvent			

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		Performance Standard							
						accounting system - Spray booth cleaning - Application equipment requirements -Formulation assessment plan records			
Monitoring, Recordkeeping, and Reporting: Emission averaging				NQ	Averaging: - CPDS - Data sheets showing coating and thinner usage - amount of coating used per day - copies of averaging	Averaging: - CPDS - Data sheets showing coating and thinner usage - amount of coating used per day - copies of averaging calculation			